

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

NIKI FRENCHKO,	:	Case No. 4:23-cv-781
	:	
Plaintiff,	:	
	:	Judge J. Philip Calabrese
v.	:	
	:	
PAUL MONROE, <i>et al.</i> ,	:	Magistrate Judge Thomas M. Parker
	:	
Defendants.	:	

**JOINT MOTION FOR EXTENSION FOR OBJECTIONS TO PLAINTIFF'S
SUBPOENAS ON BEHALF OF DEFENDANTS**

Now comes the Defendants, Sheriff Paul Monroe, Trumbull County, Trumbull County Board of Commissioners, Trumbull County Sheriff's Office, Mauro Cantalamessa, Frank Fuda, Sergeant Wix, and Sergeant Ross, and jointly request a three-day extension to submit their objections to Plaintiff's subpoenas for phone record discovery. If granted, the Defendants will have until on or before May 15, 2023 to send any objections to Plaintiff's subpoenas.

On May 3, 2023, this Court entered a non-document Order pursuant to N.D. Ohio Local Rule 16.4(e) permitting Magistrate Judge Parker to extend any deadline in the case. The Defendants participated in good faith during the May 3, 2023 and May 10, 2023 mediations before Judge Parker and concentrated their efforts there. Unfortunately, these efforts did not result in a resolution of the case. Counsel for Defendant and Counsel for Plaintiff called to confer regarding this request. Counsel for Plaintiff confirmed they are agreeable to this request for an extension. Accordingly, Defendants will need a minor, three-day extension until May 15, 2023 to provide their objections to Plaintiff's subpoenas.

Respectfully Submitted,

/s/ Andrew N. Yosowitz (per email consent 5-11-23)

Andrew N. Yosowitz (0075306)
Matthew S. Teetor (0087009)
Teetor Westfall, LLC
200 E. Campus View Blvd. Suite 200
Columbus, OH 43235
(614) 412-4000 – Telephone
(614) 412-9012 – Facsimile
ayosowitz@teetorlaw.com
mteetor@teetorlaw.com
*Attorney for Defendants Harold Wix and
Robert Ross*

s/ Daniel T. Downey

Daniel T. Downey (0063753)
Helen K. Sudhoff (0101259)
**FISHEL DOWNEY ALBRECHT &
RIEPENHOFF LLP**
7775 Walton Parkway, Suite 200
New Albany, OH 43054
(614) 221-1216 – Telephone
(614) 221-8769 – Facsimile
ddowney@fisheldowney.com
hsudhoff@fisheldowney.com
*Counsel for Defendants Sheriff Paul
Monroe, Trumbull County, Trumbull
County Board of Commissioners, Trumbull
County Sheriff's Office, Mauro
Cantalamessa, and Frank Fuda*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **JOINT MOTION FOR EXTENSION FOR OBJECTIONS TO PLAINTIFF'S SUBPOENAS ON BEHALF OF DEFENDANTS** was served, via the Court's CM/ECF system, upon all counsel this 12th day of May, 2023.

s/ Daniel T. Downey

Daniel T. Downey (0063753)
FISHEL DOWNEY ALBRECHT & RIEPENHOFF LLP
*Counsel for Defendants Sheriff Paul Monroe,
Trumbull County, Trumbull County Board of
Commissioners, Trumbull County Sheriff's Office,
Mauro Cantalamessa, and Frank Fuda*